

**Freedom Court Reporting, Inc**

**1**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

Case No. 2:08-cv-422- TJW

---

DEPOSITION OF LORRAINE MUTCH

May 6, 2010

---

PATTY BEALL, MATTHEW MAXWELL, TALINA MCELHANY and  
KELLY HAMPTON, individually and on behalf of all  
others similarly situated,

Plaintiffs,

vs.

TYLER TECHNOLOGIES, INC., and EDP ENTERPRISES, INC.,  
Defendants.

---

APPEARANCES:

ZELBST, HOLMES & BUTLER

By Chandra L. Holmes Ray, Esq.

P.O. Box 365

Lawton, Oklahoma 73502

Appearing on behalf of Plaintiffs.

MORGAN, LEWIS & BOCKIUS, LLP

By Paulo B. McKeeby, Esq.

1717 Main Street, Suite 3200

Dallas, Texas 75201-7347

Appearing on behalf of Defendants.

Also Present: H. Lynn Moore, Jr.

**367 Valley Avenue Birmingham Alabama (877) 373-3660**

EXHIBIT 0029

## Freedom Court Reporting, Inc

51

1 Lubbock?

2 A Yes.

3 Q Did they call it the conversion team?

4 A I don't recall what they were called.

5 Q Did you interact or interface with the  
6 conversion team at all in terms of your functions as  
7 an implementation specialist?

8 A Well, you had to sign on or call them so  
9 they could sign onto the server. So they did their  
10 own portion of that work.

11 Q Okay. You weren't communicating the  
12 results of your information gathering in the, what  
13 we've talked about, determining security setup,  
14 looking at reports and user IDs, you weren't  
15 communicating the information that you learned from  
16 that process to the conversion team?

17 A No. That was all done through the  
18 project manager.

19 Q All right. What does configuration mean?

20 A Configuration is the setup of security,  
21 user IDs, basic setup.

22 Q Did you do that?

23 A Yes.

24 Q That was part of your implementation  
25 functions?

Freedom Court Reporting, Inc

52

1 A (Nodded head.)

2 Q Is that yes?

3 A Configuration, yes.

4 Q Would you do any configuration typically  
5 during that first week while you were at the client  
6 site, or would that come later?

7 A That was usually done in the very  
8 beginning.

9 Q So during that first week?

10 A The first week everybody was set up with  
11 access to the database because at that point they  
12 weren't live.

13 Q Right.

14 A It was just...

15 Q Well, the setup, the security setups and  
16 the user IDs, that had to be established in the new  
17 software, correct?

18 A Correct.

19 Q And that's what configuration is?

20 A That's correct.

21 Q And you -- part of your work as  
22 implementation specialist was to do that  
23 configuration?

24 A Work with the customer to do that. The  
25 customer was -- you want to make the customer have

## Freedom Court Reporting, Inc

53

1 ownership of the software as quickly as possible.

2 So we didn't do anything alone. The customer was  
3 involved in everything we did.

4 Q So when you're doing the configuration,  
5 you're involving the customer in terms of getting  
6 the customer's input as to how they want the system  
7 configured?

8 A Yes.

9 Q And, again, this is that contact person?

10 A Yes.

11 Q And so does this dialogue occur during  
12 this first week that you are at the customer site?

13 A Yes.

14 Q And this is obviously before you go live?

15 A Yes.

16 Q And I take it that the go-live process  
17 doesn't occur during the first week?

18 A No.

19 Q How -- I'll ask it this way: How long  
20 did the configuration process take place at the  
21 Bonifay, Florida, implementation?

22 A We were there a week.

23 Q And did it take you a week to do the  
24 configuration?

25 A Yes.

1 configuration, though, correct?

2 A Yes.

3 Q What else is involved in configuration,  
4 other than setting up security settings and user  
5 IDs, because that -- I mean, that doesn't take a  
6 whole week, obviously?

7 A You would meet with the different  
8 divisions, look at their processes. For example, if  
9 they were entering vendors, if they were doing  
10 payroll, you know, really kind of document what  
11 their position was, what their functions were.

12 Q Okay. What else? Other than meeting  
13 with the divisions and looking at their processes  
14 and functions, what else is involved in the concept  
15 of configuration as defined in that process that, as  
16 you described, takes as much as a week's time?

17 A It actually takes quite a bit of time to  
18 do all that. It may not sound like it, but it does.

19 Q Well, okay, I understand it takes some  
20 time to do all of that. But what else is involved  
21 in configuration, other than doing user IDs, setting  
22 up the security settings, and meeting with the  
23 divisions to look at their processes and functions?

24 A You know, as I mentioned earlier, the  
25 reports that they ran, the -- their balance sheet



## Freedom Court Reporting, Inc

66

1 to do the configuration process?

2 A Of course.

3 Q Apart from training, I mean?

4 A Yes.

5 Q And that, I guess, gets to my question:

6 What is it that you're doing in the configuration

7 process with this information? What the person is

8 doing on a day-to-day basis, you're just

9 communicating that to the project manager, or are

10 you doing something --

11 A Well, that --

12 Q -- different with the information?

13 A That helps -- helps you in knowing -- I

14 mean, what the customer -- what the customers told

15 you, what their user IDs, what their -- what data

16 that person needs. So that helps you know, really

17 in the Tyler Technologies side of things, like what

18 information that -- that person is able to access.

19 Q And so that assists you in configuring

20 the software?

21 A Yes.

22 Q Because you configure the software in a

23 way as to permit that particular individual to have

24 access to the information that the customer has told

25 you he or she needs to have access to?

Freedom Court Reporting, Inc

67

1           A       Correct.

2           Q       Do you -- are you familiar with the term  
3       "chart of accounts"? Does that mean anything to  
4       you?

5           A       Yes.

6           Q       What does that mean?

7           A       It's your asset/liability accounts, which  
8       is your --

9           Q       Budget?

10          A       Budget, yes.

11          Q       And does part of configuration involve  
12       meeting with the customer to determine how they want  
13       their chart of accounts set up?

14          A       Yes.

15          Q       And so that's meeting -- you get that  
16       information through meetings with the customer?

17          A       Yes.

18          Q       And then do you communicate that  
19       information as to how they want their chart of  
20       accounts set up to the project manager, or is that  
21       information that you utilize in connection with some  
22       other configuration work that you do?

23          A       Project manager. But you also use that  
24       as, you know, a guideline for the chart of accounts.  
25       They -- you don't want to interrupt their flow of

## Freedom Court Reporting, Inc

103

1 A -- maybe the following week.

2 Q So -- but -- okay. When the customer --  
3 maybe it's not a question you can answer. But would  
4 the customer typically go live on like a Thursday,  
5 or was there a particular day, or did it just  
6 depend?

7 A It would just depend.

8 Q And the amount of time you would have to  
9 spend after the customer went live also would depend  
10 on how many problems the customer was encountering?

11 A Yes.

12 Q Did you provide any support to the  
13 customer after you had left the facility and moved  
14 on to your next implementation, or did you transfer  
15 them to the support team?

16 A If they had any questions, they knew that  
17 they could call us. We set them up with, you know,  
18 right away saying, if it's anything major, they  
19 would have to contact the support team. But we  
20 tried to give them as much support as possible  
21 after, you know, after the go-live date --

22 Q Was there --

23 A -- for a certain extent.

24 Q Was there a particular period of time in  
25 which they could call you?



## Freedom Court Reporting, Inc

104

1           A     No, not really. I mean -- and during  
2     those first couple of weeks, two or three weeks in  
3     between times, you know, some of the customers would  
4     have a question, and they felt comfortable calling  
5     us and asking us.

6           Q     And when you say "us," you mean...

7           A     Well, me or whoever was doing their  
8     implementation, yes.

9           Q     Okay. But you would get calls after you  
10    had left, after the customer had gone live, about,  
11    you know, particular issues that would come up?

12          A     Yes.

13          Q     And that would be when you were on the  
14    site of a different implementation?

15          A     Yes.

16          Q     Have --

17                MR. McKEEBY: -- I'm going to show her  
18    this document.

19          Q     (By Mr. McKeeby) This is a document that  
20    I'll represent to you the company produced in the  
21    case that -- in the lawsuit -- that I understand to  
22    have entries for your times during your employment?

23          A     Yes.

24          Q     Let me ask you, first: Have you ever  
25    seen a document like this?

## Freedom Court Reporting, Inc

119

1 STATE OF COLORADO)

2 ) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER )

4 I, Beth Milliken, do hereby certify that I  
5 am a Court Reporter and Notary Public within and for  
6 the State of Colorado; that previous to the  
7 commencement of the examination, the deponent was  
8 duly sworn to testify to the truth.

9 I further certify that this deposition was  
10 taken in shorthand by me at the time and place  
11 herein set forth, that it was thereafter reduced to  
12 typewritten form, and that the foregoing constitutes  
13 a true and correct transcript.

14 I further certify that I am not related  
15 to, employed by, nor of counsel for any of the  
16 parties or attorneys herein, nor otherwise  
17 interested in the result of the within action.

18 In witness whereof, I have affixed my  
19 signature and seal this 17th day of May, 2010.

20 My commission expires May 31, 2011.

21

22

23

24

25

Beth Milliken, Court Reporter  
216 - 16th Street, Suite 650  
Denver, Colorado 80202